



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

Ref: SHWM-FF

JAN 6 1992

Mr. Gary Baughman
Colorado Department of Health
4210 E. 11th Ave.
Denver, CO 80220

Re: OU 9 Final Workplan

Dear Mr. Baughman:

In general, this document has improved considerably over the draft version. Most of EPA's previous comments on the draft have been adequately addressed. However, there are still some problems and concerns with some of the proposed activities described in the Field Sampling Plan (FSP) and with the Baseline Risk Assessment (BRA) plan included in this document. In the interest of moving forward with the project, EPA recommends approval of the workplan assuming DOE makes the following changes and addresses the concerns outlined below:

1. PCBs and pesticides must be included in the analyte list for stage 1 field sampling activities. If it is determined that these contaminants are not present in the OPWL, then there would not be a need for their analysis during subsequent field investigations.
2. Sampling interval for investigation of pipelines must be less than 200 feet.
3. The number of soil samples to be taken in each proposed test pit must be specified.
4. Radiological survey results must not be used to select test pits location.
5. Boreholes must be placed perpendicular to the pipelines, as well as along the trench, at least for those locations where evidence of releases is encountered.
6. The FSP must include a vadose zone monitoring program.
7. The workplan needs to explain how the risk assessment and environmental evaluations, and the phase I/phase II scheme set up in the IAG fit together.
8. The BRA portion of this document must include and discuss site-specific methods for dealing with site-specific conditions.

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ADMIN RECORD

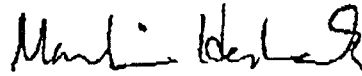
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If DOE is unable to resolve the above concerns prior to the scheduled start of field activities (February 5, 1992), it is EPA's position that DOE can commence field activities which are not associated with the above concerns. However, since CDH is the lead agency for this OU, commencement of field activities shall be contingent upon CDH approval.

Additional necessary efforts identified as work proceeds can be added to the program by amending the plan with technical memoranda. Enclosed, please find EPA's general and specific comments on the workplan which should be taken into consideration during execution of the field program.

Please do not hesitate to contact Arturo Duran of my staff at (303) 294-1080 with any question or comments you may have.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

Attachment

cc:

Frazer Lockhart, DOE
Bruce Thatcher, DOE
Joe Schieffelin, CDH
Arturo Duran, EPA